

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

IN RE:

**KEVIN M. GILDEA
LISA A. GILDEA,**

DEBTOR.

**Case No.: BK-14-81484-
Chapter 13**

OBJECTION TO CHAPTER 13 PLAN OF DEBTOR

Comes now the secured creditor, Nationstar Mortgage, LLC, by their attorney, Robert Hauge, and hereby objects to the Chapter 13 Plan of Debtor. In support of this Objection, Nationstar Mortgage, LLC would show the Court as follows:

1. Nationstar Mortgage, LLC is the holder of a purchase money note and mortgage on the residence, ("mortgaged property") of Debtor. Said note and mortgage has an estimated outstanding balance of \$229,631.45 plus accruing interest along with reasonable attorney fees and for all costs of the action.

2. The proposed Chapter 13 Plan of the Debtor reflects an arrearage amount of \$0.00. Nationstar Mortgage, LLC disputes this amount and would propose that the correct estimated arrearage amount is \$8,116.52.

WHEREFORE, PREMISES CONSIDERED, secured creditor, Nationstar Mortgage, LLC, moves the Court to reject the proposed Chapter 13 Plan of Debtor and/or to grant adequate protection or such other and further relief as may be entitled.

NATIONSTAR MORTGAGE, LLC,

By: s/ Robert Hauge_____
ROBERT HAUGE - #20007
Baer, Timberlake, Coulson & Cates, P.C.
6846 South Canton, Suite 100
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Telephone: (918) 491-3100
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Attorney for Movant

CERTIFICATE OF SERVICE

I hereby certify that I mailed a true and correct copy of the above and foregoing Objection with postage thereon fully prepaid to the parties listed below on January 20, 2015.

Kevin M. Gildea
Lisa A. Gildea
20556 E 47th St. S.
Broken Arrow, OK 74014

The following persons should have received notice of the above and foregoing instrument on the same day it was filed by the Court's CM/ECF Electronic Noticing System.

W. Mark Bonney
215 State St Ste 1000
PO Box 1548
Muskogee, OK 74402

Anna C Hanson, Esq.
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Tulsa, OK 74137

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